

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

ALTERA INFRASTRUCTURE PROJECT
SERVICES LLC,¹

Reorganized Debtors.

)
) Chapter 11
)
) Case No. 22-90129 (MI)
)
) (Formerly Jointly Administered Under
) Lead Case: Altera Infrastructure L.P.,
) 22-90130)

**SUPPLEMENTAL DECLARATION OF DAVID RUSH IN SUPPORT
OF THE DEBTORS' APPLICATION FOR AUTHORITY TO EMPLOY
AND RETAIN FTI CONSULTING, INC. AS FINANCIAL ADVISOR TO THE
DEBTORS AND DEBTORS IN POSSESSION, EFFECTIVE AS OF AUGUST 12, 2022**

Pursuant to 28 U.S.C. § 1746, David Rush hereby declares as follows:

1. I am a Senior Managing Director at FTI Consulting, Inc. (together with its wholly owned subsidiaries, "FTI"), a global financial advisory services firm and financial advisor to the above-captioned debtors and debtors in possession ("Debtors"). I submit this supplemental declaration (the "Supplemental Declaration") in further support of *Debtors' Application for Authority to Employ and Retain FTI Consulting, Inc. as Financial Advisor to the Debtors and Debtors in Possession, Effective as of August 12, 2022* [Docket No. 230] (the "Application"),² filed on September 12, 2022. Except as otherwise noted, I have personal knowledge of the matters set forth herein and if called as a witness, would testify competently thereto.

¹ A complete list of each of the reorganized Debtors in these chapter 11 cases (collectively, the "Reorganized Debtors," and before the January 6, 2023, effective date of the chapter 11 plan, collectively, the "Debtors") may be obtained on the website of the Reorganized Debtors' Claims and Noticing Agent at <https://cases.stretto.com/Altera>. The location of Reorganized Debtor Altera Infrastructure Project Services LLC's principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is Altera House, Unit 3, Prospect Park, Prospect Road, Arnhall Business Park, Westhill, AB32 6FJ, United Kingdom.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Application.

2. In support of the Application, the Debtors filed the *Declaration of David Rush in Support of the Debtors' Application for Authority to Employ and Retain FTI Consulting, Inc. as Financial Advisor to the Debtors and Debtors in Possession, Effective as of August 12, 2022* [Docket No. 230] (the "Original Declaration") as Exhibit C to the Application. On October 6, 2022, the Court entered an order granting the Application and authorizing the employment and retention of FTI as financial advisor to the Debtors [Docket No. 325] (the "Retention Order").

3. I submit this Supplemental Declaration in support of the Application and to supplement, but not replace, the disclosures set forth in the Original Declaration in accordance with Bankruptcy Rules 2014(a) and as required under the Retention Order.

Additional Disclosures

4. FTI has searched its internal computer database³ containing names of individuals and entities that are present or recent former clients of FTI for connections to parties in interest in these chapter 11 cases. In addition to the entities searched and disclosed in the Original Declaration, FTI searched its internal computer database for the new entities listed on **Schedule 1** attached hereto. A summary of such relationships that FTI identified during this process is set forth on **Schedule 2**, attached hereto.

5. In addition, FTI re-ran searches in its electronic database for the entities that were previously reviewed and set forth on Schedule 1 to the Original Declaration. Any new client connections for entities identified in the Original Declaration are also set forth on **Schedule 2** to this Supplemental Declaration. All current and prior engagements of the parties identified on **Schedule 2** are in matters unrelated to the Debtors and these chapter 11 cases.

³ For the avoidance of doubt, FTI's computer database covers FTI Consulting, Inc. and its wholly-owned subsidiaries globally.

6. Based on the disclosures herein and the Original Declaration, to the best of my knowledge, FTI does not hold or represent any interest adverse to the estate, and therefore believes it continues to be eligible to represent the Debtors.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 2, 2023

/s/ David Rush

David Rush
Senior Managing Director
FTI Consulting, Inc.

Schedule 1**LISTING OF ADDITIONAL PARTIES-IN-INTEREST
REVIEWED FOR CURRENT RELATIONSHIPS****NOTICES OF APPEARANCE**

Kristian Gluck	Matthew Scheck
Julie G. Harrison	Patricia B. Tomasco
Jason Blanchard	Equinor UK Limited
Michael Berthiaume	J. Eric Lockridge
David Rosenzweig	KEAN MILLER LLP
Francisco Vazquez	Michael D. Warner
Paul M. Basta	Benjamin L. Wallen
Brian S. Hermann	PACHULSKI STANG ZIEHL & JONES LLP
Jacob A. Adlerstein	Richard M. Pachulski
Andrew J. Ehrlich	Alan J. Kornfeld
Gregory F. Laufer	Malhar S. Pagay
Douglas R. Keeton	Lawrence S. Robbins
John F. Higgins	Robert J. Lack
M. Shane Johnson	FRIEDMAN KAPLAN SEILER & ADELMAN
Emily D. Nasir	LLP
Porter Hedges LLP	Gregory M. Wilkes
Paul E. Heath	Emma L. Persson
Elias M. Medina	O'MELVENY & MYERS, LLP
Matthew W. Moran	Daniel S. Shamah
Trevor A. Spears	Shari L. Heyen
Emil A. Kleinhaus	GREENBERG TRAUIG, LLP
Michael S. Benn	Michael B. Fisco
Benjamin S. Arfa	Peter D. Kieselbach
Michael H. Cassel	Serasa S.A.
Stephanie A. Marshak	Joseph D. Frank
Ronald A. Hewitt	Karen V. Newbury
Martin E. Beeler	FRANKGECKER LLP
Thomas A. Woolley, III	WELLS FARGO CLEARING SERVICES,
Carissa Brewster	LLC
McCloskey Roberson Woolley, PLLC	Donald R. Littlefield
U.S. Bank Trust Company, N.A.	Susan A. Logsdon
Benjamin I. Finestone	BRESSLER, AMERY & ROSS, P.C.

RESPONSES TO EQUITY CLAIM OBJECTIONS

Bohdan Dowhaluk	June Mera
Luba Dowhaluk	Jeffrey M. Kowalski
Hiromi Yoneda	Virginia K. Schwingel
Hideko Yamamoto	Erin-Kate Escobar
Janice Gay Yamamoto	Kaelyn Chapman
Alex Castro	Freya Read
Dennis Dunne	Mark Madson
Thomas Grudkowski	Gail Madson
Meredith Mullins	Wayne Busby
Kimm Hogue	Yolanda Busby
Eric Garcia	Arnulfo Garcia
John Mera	Minerva Garcia

Schedule 1**LISTING OF ADDITIONAL PARTIES-IN-INTEREST
REVIEWED FOR CURRENT RELATIONSHIPS**

Katherine Douglas
 Warren Miller
 Michael Grudkowski
 George Ferris Lipscomb
 Amanda Caldwell Beason
 Brenda Taylor
 Jesse E. Sprayberry
 Judith A. Frazier
 Eula H. Ingram
 Bobbie Cobb
 Lisa A. Vieira
 Geoffrey G. Stedman
 Kimberly H. Stedman
 James P. Jarrell
 Liane Komure
 Chris Kinard
 Dorothy E. Cain

Gretchen Greer Britt
 Claud Elledge
 David M. Taggart
 Gene Vallortigara
 Jay Vallortigara
 Li Shin Wu
 Daniel McLoughlin
 David Belpert
 Jia-Yen Weng
 William John Price
 Lishin Wu
 Ana Isabel Martell
 Andrew K Sheldon
 John T. Lesley
 Joseph Baxer
 Mary Ghobrial
 Refaat Makkar

OBJECTION TO PLAN

James J. Angel

CLAIM OBJECTIONS

Adams, Lee
 Allen & Judith Daitch Trust
 Allen, Charlotte
 Alsid, Diane
 Alsid, Gerald John
 Andruk, Gregory A.
 Anthony K. Baker Trust
 Baird, Martina A.
 Baker, James A.
 Barnes, Christopher L.
 Baumgartner, E. John
 Baxer, Joseph J.
 Beason, Amanda C.
 Bengier, John
 Bengier, Pamela
 Bennett, Michael
 Bert V. Borngesser III Trustee
 Bert Vance Borngesser III
 Bodine, Norman
 Borngesser, Nancy L.
 Boyd, Clarence
 Briaire, Dominique
 Britt, Gretchen Greer
 Bruce Dean Dearman 2007 Living Trust
 Busby, Yolanda

Cain, Dorothy E.
 Calzolari, Laura
 Castro, Alex
 Chan, Kit Mei
 Chapman, Kaelyn
 Charles Schwab & Co. Inc.
 Cheek, Johanna
 Chen, Hsiaoting
 Chun, Ko Hung
 Cielo Revocable Trust
 Clare B. Devlin Revocable Trust U/A Dated
 03/13/1997
 Clark, Phillip
 Clere, Larry
 Cobb, Bobbie
 Coleman, James
 Cossel, Wilbert
 Cramblit, Joseph
 Crews, John R.
 Crowley, Jane Marie
 Daitch, Mark
 David J. Dreyfus & Camille V. Dreyfus Living
 Trust
 David J. Dreyfuss & Camille V. Dreyfuss Trust
 U/A 5/08/1982

Schedule 1

**LISTING OF ADDITIONAL PARTIES-IN-INTEREST
REVIEWED FOR CURRENT RELATIONSHIPS**

De Kleiman, Sandra Tobal
Dearman, Bruce Dean
Dearman, Sarah Meadows
Demcak, Carolyn
Devlin, Clare B.
Dilda, Joyce
Dipalma, Frank T.
Donlan, John
Donna Ilene Chrenka Living Trust dated
10/23/08, The
Douglas, Katherine
Dowhaluk, Bohdan
Dowhaluk, Luba Yurkiw
Dunne, Dennis
Duty, David
Elledge, Claud
EP Coz
Escobar, Erin Kate
Etkin & Co. Inc.
Eugene A. Bova Exemption Trust
Eula H. Ingram Roth IRA RBC Cap Markets
Cust
Feagin, William
Feria, Guillermo
Fidelity Security Custody for William
Richardson IRA
Finley, Johanne Etkin
Forte, Michael J.
Frazier, Janet
Fuller, Frederick
Furey, Edward P., Jr.
Furey, Patricia
Garcia, Arnulfo
Garcia, Eric
Garcia, Minerva
George Rose Bethel Community Cemetery, The
Gernon, John Dean
Ghobrial, Mary
Gianelli, John
Gianelli, Martha
Gibb, Daniel R.
Gizzi, Paul
Go, Ka Wai
Grant, Susan P.
Graves, Gary
Graves, Gary G.
Graves, Shirley J.

Gretchen Greer Britt Bene IRA Corinne Doty
Greer Deed.
Grim, Michael G.
Grudkowski, Michael
Grudkowski, Thomas
Gst, Ben Etkin
Gunther, Frederick
Hanover Packard Group LLC, The
Har, Siu Lai
Harris, Christina
Harwell, Patricia
Harwell, Robert
Hatchell, Elizabeth
Heimstraedt, Lorraine
Herr, David T.
Herrmann, Kathleen
Herrmann, Robert
Hester, Cynthia Jones
Hogue, Kimm
Hooper, Tamara Melody
Hsieh, Meng-Shu
Hu, Jun
Ingram, Eula H.
Ira, Gregory Barr
Jain, Ashok K.
Jain, Neelima
Jarrell, James
Jensen, Carol A.
Johns, Deborah
Johnson, Henry C.
Kalin, Sharon
Katherine K. Modahl Living Trust
Kin, Chan Ka
Kinard, Chris
King Family Trust, The
Knippel, Wayne L.
Komure, Liane
Konde, Joseph
Kook, Marita
Kook, Raymond L.
Kotsol, Paul
Kowalski, Jeffrey
Krell, G. Kent
Kukucka, Joseph R.
Kurt A. & Anne E. Beyreis Joint Tenants
Kwan, Sum Hong Samuel
Labroke, David M.

Schedule 1

**LISTING OF ADDITIONAL PARTIES-IN-INTEREST
REVIEWED FOR CURRENT RELATIONSHIPS**

Labrousse, Joseph Lionel
 Larose, Richard A.
 Leinwand, Kenneth
 Leon, Dale E.
 Leslie, Judith Podesta
 Leslie, Neil William
 Lipscomb, George F.
 Lithgow, Enrique W.
 Lowell W. Wallace Survivors Trust
 Lu, Shan
 Lu, Tory
 Lyon, Joanne E.
 Madson, Gail
 Mahar, Jeanne Marie
 Makkar, Refaat
 Man, Ho Hoi
 Marcil, Sallie
 Marcil, Thomas
 Martell, Ana Isabel
 Martin, William C., III
 McCaskey, Douglas E.
 McMichael, Brian C.
 Megura, Jim
 Meng-Shu, Hsieh
 Mera, John
 Miller, Warren
 Mills, Ralph
 Monbleau, Sally
 Morillo, Patricia
 Morrison, Frank Thomas
 Mosely, Patricia C.
 Mullins, Meredith
 Mulvanny, Thomas J.
 Murdock, Russell E.
 Murphy, Charles
 Murray, Chris
 Neumann, Gary W.
 Palermo, Lucien
 Pederson, Richard B.
 Perez, Kathleen J.
 Piotrasch, Michael
 Plaskett, Howard S.
 Price, Roderick
 Pringle, Donald E.
 Pringle, Heather A.
 Pringle, Landon Lee
 Rabon, Bonnie

Ratkovich, William L.
 Reiner, Po Mark
 Revocable Trust of John Robert Demeester
 Rich, Deborah
 Rich, Jerry
 Richardson, William
 Rivera, Veronica
 Robbins Nancy L.
 Rodriguez, Robin Kevin
 Ronald F. Pergamit Trust
 Rovinsky, Michelle
 Salvey, John C.
 Sarah M. Dearman 2007 Living Trust
 Saulnier, Joseph
 Saunders, Larry A.
 Sayre, Stevan F.
 Schmucler, Sergio
 Schultheis, Richard
 Schwingel, Virginia
 Serna, David R.
 Settimi, Patricia L.
 Sheldon, Andrew
 Shelor, Bonnie J.
 Smalkoski, John C.
 Smith, Robert Scot
 Smith, Thomas E.
 Snyder, Franklin R., Jr.
 Sola, Jose Rolando
 Stines, Mary Lou
 Stoliar, Saul Kleiman
 Sullivan, Christina B.
 Sullivan, Robert C.
 Taylor, Brenda
 Tejada, Jose Fernando Mesa
 Tobal, Alexis Estela Kleiman
 Tobal, Lauren Kleiman
 Tuthill, Cheryll Hall
 Tybus, Andrew P.
 Vidor, Bela
 Vieira, Lisa
 Vierkant, Matthew
 Wallace, Lowell W.
 Wang, Aaron W.
 Watts-Fitzgerald, Abigail
 Weng, Jia-Yen
 Weng, Wanting
 Wilson, Bryce Houston

Schedule 1

**LISTING OF ADDITIONAL PARTIES-IN-INTEREST
REVIEWED FOR CURRENT RELATIONSHIPS**

Wilson, Harold E.
Wilson, Terri S.
Wolin, Ronald
Wong, Ka Cheong
Wu, Iishin
Yamamoto, Hideko
Yamamoto, Janice
Yoneda, Hiromi

Yu, An Jin
Yuen, Wai Ling
Zacher, Brian
Zanders, Linda Martin
Zeevy, Yishay
Zucker, Jane E.
Zucker, Miriam S.

Schedule 2

PARTIES-IN-INTEREST NOTED FOR COURT DISCLOSURE

Matters Not Relating to Debtors

CURRENT CLIENTS:

BRESSLER, AMERY & ROSS, P.C.	NIBC Bank N.V.
Brookfield Group	O'MELVENY & MYERS, LLP
Charles Schwab & Co. Inc.	PACHULSKI STANG ZIEHL & JONES LLP
DBS Bank Ltd	Petróleo Brasileiro S.A. - Petrobras
FRIEDMAN KAPLAN SEILER & ADELMAN LLP	Porter Hedges LLP
GREENBERG TRAURIG, LLP	PriceWaterhouseCoopers
ING Bank N.V., Singapore Branch	Societe Generale, London Branch
International General Insurance Company Ltd	U.S. Bank Trust Company, N.A.
KEAN MILLER LLP	WARTSILA NETHERLANDS BV
Kirkland & Ellis	WARTSILA UK
KPMG AS	Watson Farley
	WeWork

FORMER CLIENTS:

DNB Capital LLC	Vistra Limited
OON & BAZUL LLP	WELLS FARGO CLEARING SERVICES, LLC
Schjodt AS	
SCHJODT LLP	